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Ohio Environmental Protection Agency
DAPC – Permit Management Unit
Lazarus Government Center
P. O. Box 1049
Columbus, Ohio 43216-1049

October 10, 2018

City of Toledo
Division of Environmental Services
348 S. Erie Street
Toledo, OH 43604
Attn: Philip Stiff, III

RE: QQQ Compliance Plan – Certified Project Completion Report BP-Husky Refining LLC, Toledo Refinery (Facility ID 044802007)

Dear Sir or Madam:

The BPH Toledo Refinery's Title V permit contains a NSPS Part 60, Subpart QQQ compliance plan requiring the Refinery to complete certain compliance projects and submit certain reports to Ohio EPA / TDES. The compliance plan requires the Refinery to submit a certified project completion report to Ohio EPA / TDES no later than November 30, 2018. This letter is the Refinery's certified project completion report.

In 2017, BPH developed and initiated a QQQ compliance plan. The plan was split into three phases that included the following known or suspected non-compliant components:

- Phase 1:
- (1) Seal two (2) Crude Vac 1 cleanouts and provide water seal controls on four (4) downstream manholes and one (1) downstream area drain.
 - (2) Install water seal controls on three (3) Crude Vac 2 catch basins.
 - (3) Revise inspection forms, inspection maps, and inspection procedures to account for the upgraded components.
 - (4) Submit certified report of progress through 06/30/2017.

- Phase 2:
- (1) Install water seal controls on all sewer components of an individual drain system (IDS) serving tanks PR-500001 (T159), PR-500002 (T157), and PR-500003 (T161), including six (6) catch basins, four (4) process drains, and one (1) area drain.
 - (2) Install water seal controls on six (6) ISO 2 catch basins and two (2) ISO 2 process drains.
 - (3) Revise inspection forms, inspection maps, and inspection procedures to account for the upgraded components.
 - (4) Submit certified report of progress through 12/31/2017.

- Phase 3:
- (1) Repair the floating roof cover system on Zone #1 of the WWTU separator inlet channel.
 - (2) Seal the concrete joints of the WWTU bulkhead and upgrade the hatch covers to prevent VOC emissions.
 - (3) Investigate twenty-four (24) other potential non-conformant sewer components located in the BGOT (5), Unsat Gas Plant (4), the WWTU (2), East Tank Field (10), West Tank Field (1), and North Tank Field (2), and install any needed water seal controls.
 - (4) Revise inspection forms, inspection maps, and inspection procedures to account for the upgraded components.
 - (5) Submit certified report of progress through 06/30/2018.
 - (6) Submit certified project completion report.

The compliance plan was incorporated into the Refinery's Title V permit when the permit went into effect on August 3, 2017. The Refinery completed all of the work required as described below:

- Phase 1-1: Corrective action was performed to seal two Crude Vac 1 cleanouts and install water seal controls on four downstream manholes by 06/30/2017. One downstream area drain water seal was installed on 07/13/2017.
- Phase 1-2: Water seal controls were installed on three Crude Vac 2 catch basins by 06/30/2017.
- Phase 1-3: Phase 1 inspection maps and forms were updated by 06/30/2017 to capture the changes and additions to the sewer components. No revisions to the QQQ inspection procedures were required for Phase 1.
- Phase 1-4: A certified progress report was submitted to Ohio EPA/TDES on 08/01/2017.

Phase 2-1: At the IDS serving Tanks PR-500001, PR-500002, and PR-500003 in the East Tank Field, five of the existing catch basins were converted to sealed manholes and new catch basins were installed adjacent each converted manhole to manage storm water. Each new catch basin was designed with a P-trap for water seal control. The sixth existing catch basin was upgraded with a 90° turndown fitting to create a water seal control. The sewer conveying wastewater from the four process drains and area drain on the pump pad was modified by installing an inline P-trap upstream of its connection to the IDS. The P-trap was equipped with an inspection port to visually inspect for the presence of water in the P-trap. This work was completed by 12/31/2017.

Phase 2-2: In the ISO 2 Process Unit, six catch basins were retrofitted with QQQ-compliant inserts to provide water seal controls. The two untrapped process drains were rebuilt with P-traps. This work was completed by 12/31/2017.

Phase 2-3: All Phase 2 inspection maps, forms, and procedures were updated by 12/31/2017, to capture the changes and additions to the sewer components.

Phase 2-4: A certified progress report was submitted to Ohio EPA / TDES on 01/31/2018.

Phase 3-1: Repairing the floating roof cover system on Zone #1 of the separator inlet channel was completed by installing concrete fixed roof covers prior to 09/30/2018.

Phase 3-2: Corrective action was completed on 12/22/17 with the installation of gasketed hatch covers on the WWTU bulkhead, and gaps between the concrete sidewalls and lid of the bulkhead were patched with grout.

Phase 3-3: All 24 potentially non-conformant sewer components were investigated and repaired, as appropriate. All repairs were completed by 12/22/17. The following repairs were performed, and inspection procedures were updated accordingly:

BGOT (5): Five process drains in BGOT were reconstructed with P-traps;

Unsat Gas Plant (4): The catch basin on the propylene product filter pad was converted to a sealed manhole; P-traps were added to the two process drains and one area drain on the pad;

WWTU (2): Drawings showed two catch basins on a sewer from the sludge processing building to the WWTU inlet channel. Investigation found only one of the two actually having been constructed. The one catch basin was converted to a sealed manhole;

East Tank Field (10): Two catch basins handling effluent from the Inland Pipeline were converted to sealed manholes. Five catch basins downstream of Tank 175 Lift Station were investigated for the presence of water seal controls. (Four catch basins were converted to sealed manholes, with two new catch basins equipped with water seal controls added for stormwater management. There was no fifth catch basin.) The conversion of catch basins to manholes at Tanks PR-500171 and PR-500172 was completed. A catch basin at Tank PR-500175 was converted to a sealed manhole with a new catch basin equipped with water seal controls added for stormwater management;

West Tank Field (1): A P-trap was installed on the 12-inch sewer entering manhole MH-158 from the north to provide a water seal control for the catch basins in the secondary containment basins of Tanks PR-500094, PR-500095, PR-500189, PR-500392, and PR-500393;

North Tank Field (2): Two catch basins installed to drain stormwater from the secondary containment dike of Butane Sphere PR-500662 (T042) were retrofitted with water seal controls.

Phase 3-4: Phase 3-3 and 3-4 inspection maps, forms, and procedures were updated by 07/30/2018. Phase 3-1 maps, forms, and procedures were updated on 09/28/2018.

Phase 3-5: A certified report of progress was submitted to Ohio EPA / TDES on 07/31/2018.

Phase 3-6: This report fulfils the requirement to submit a certified project completion report to Ohio EPA/TDES by 11/30/2018.

All phases of the QQQ compliance plan have been completed as described herein. Based on information and belief formed after reasonable inquiry, the statements and information in this report are true, accurate, and complete.

If you have any questions, please contact Steve Hoyt at (419) 697-4811.

Sincerely,

A handwritten signature in black ink, appearing to read "Des Gillen". The signature is fluid and cursive, with the first name "Des" and last name "Gillen" clearly distinguishable.

Des Gillen
President – BP-Husky Refining LLC

bc: D. Gillen
R. Hammer
A. Ellett
E. Myers
L. Hefner
G. Rodriguez
L. Leach
D. Chovanec
B. Brown
N. Sandys
J. Wigger
M. Snyder
D. Bell
J. Gonzalez
K. Comey
J. Savage

File 4E11 – QQQ Cerification Reports